

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 07 CR 843-6
v.)	
)	Hon. Judge Joan H. Lefkow
SENECCA WILLIAMS,)	Magistrate Judge Sidney Schenkier
)	
Defendant.)	

MOTION FOR AN ORDER REQUIRING THE GOVERNMENT TO SUBMIT
A *SANTIAGO* PROFFER

Now comes the Defendant, SENECCA WILLIAMS, by his attorney Ralph J. Schindler, Jr., and respectfully moves this Honorable Court for the entry of an order requiring the Government to file a *Santiago* proffer, establishing pursuant to Rule 801(c) and 802 of the Federal Rules of Evidence the admissibility of co-conspirator statements, specifically establishing that:

- a) A conspiracy existed;
- b) The defendant and the declarants were members of the alleged conspiracy; and
- c) That any such statements were made during the course of and in furtherance of the alleged conspiracy.

WHEREFORE, Defendant, SENECCA WILLIAMS, prays this Honorable Court enter an order requiring the United States Attorney's Office to file a *Santiago* proffer at the earliest possible time.

Respectfully Submitted,

/s/ Ralph J. Schindler, Jr.

Ralph J. Schindler, Jr.
Attorney for SENECCA WILLIAMS

Law Offices of Ralph J. Schindler, Jr.
53 West Jackson Boulevard, Suite 818
Chicago, IL 60604
(312) 554-1040
Atty. No.: 2484471